

Richard S. Mills, Esq. (RM-0206)  
John P. Cookson, Esq. (JPC-9391)  
McElroy, Deutsch, Mulvaney & Carpenter, LLP  
Wall Street Plaza  
88 Pine Street, 24<sup>th</sup> Floor  
New York, New York 10005  
(212) 483.9490  
*Attorneys for Defendant  
Ambient Group, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE  
LITIGATION

FERNANDO LUCERO,

Plaintiff,

-against-

55 WATER STREET CONDOMINIUM, ET  
AL.,

Defendants.

21 MC 102 (AKH)

INDEX NO.: 07CV5366 (AKH)

**NOTICE OF ADOPTION OF AMBIENT  
GROUP, INC.'S ANSWER  
TO MASTER COMPLAINT**

**ELECTRONICALLY FILED**

PLEASE TAKE NOTICE that Defendant, AMBIENT GROUP, INC., by its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Answer to Master Complaint dated August 2, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, AMBIENT GROUP, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
September 14, 2007

Yours etc.,

McElroy, Deutsch, Mulvaney & Carpenter, LLP  
*Attorneys for Defendant*  
*Ambient Group, Inc.*

By:

Richard S. Mills (RM-0206)  
John P. Cookson (JPC-9391)  
Wall Street Plaza  
88 Pine Street, 24<sup>th</sup> Floor  
New York, New York 10005  
(212) 483.9490

TO: Worby Groner Edelman & Napoli Bern, LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(212) 267.3700

Gregory J. Cannata, Esq.  
Robert A. Grochow, Esq.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 553.9206

James E. Tyrrell, Jr., Esq.  
Patton Boggs LLP  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 848.5600

Thomas A. Egan, Esq.  
Fleming Zulack Williamson Zauderer, LLP  
One Liberty Plaza  
New York, New York 10006-1404  
(212) 412.9500

**CERTIFICATE OF SERVICE**

JOHN P. COOKSON, an attorney duly admitted to practice in the Southern District of New York, hereby certifies pursuant to Fed. R. Civ. P 5, that on September 14, 2007, I caused to be served the annexed **Notice of Adoption of Ambient Group, Inc.'s Answer to Master Complaint** on the listed parties below, at the addresses designated by them for that purpose, by electronic filing in accordance with the Rules for the Southern District of New York via CM/ECF and via first class mail through the United States Postal Service.

TO: Worby Groner Edelman & Napoli Bern, LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006  
(212) 267.3700

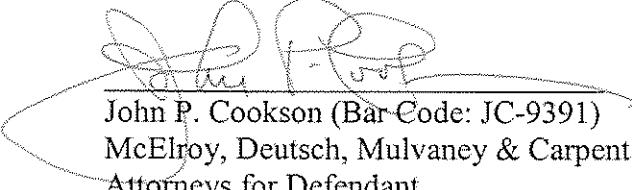
Gregory J. Cannata, Esq.  
Law Office of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 553.9206

Robert A.. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
(212) 608-4400

James E. Tyrrell, Jr., Esq.  
Patton Boggs LLP  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 848.5600

Thomas A. Egan, Esq.  
Fleming Zulack Williamson Zauderer, LLP  
One Liberty Plaza  
New York, New York 10006-1404  
(212) 412.9500

Dated: New York, New York  
September 14, 2007



John P. Cookson (Bar Code: JC-9391)  
McElroy, Deutsch, Mulvaney & Carpenter, LLP  
Attorneys for Defendant,  
Ambient Group, Inc.  
Wall Street Plaza  
88 Pine Street, 24<sup>th</sup> Floor  
New York, N.Y. 10005  
(212) 483-9490